

## State of Tennessee Department of Human Services

**Employment and Case Management Services** 

# GFA #34530-45720 TECHNICAL RESPONSE COPY



#### **TECHNICAL RESPONSE & EVALUATION GUIDE**

**SECTION A: PASS/FAIL ITEMS.** The Respondent must address all items detailed below and provide, in sequence, the information and documentation as required (referenced with the associated item references). The Respondent must also detail the response page number for each item in the appropriate space below.

The Solicitation Coordinator will review the response to determine if the Mandatory Requirement Items are addressed as required and mark each with pass or fail. For each item that is not addressed as required, the Proposal Evaluation Team must review the response and attach a written determination. In addition to the Mandatory Requirement Items, the Solicitation Coordinator will review each response for compliance with <u>all</u> RFP requirements.

PROPOSER LEGAL ENTITY NAME:		NTITY	America Works of Tennessee, Inc.		
Response Page # (Proposer completes)	Item Ref.		Section A— Mandatory Requirement Items		
		Deadline sp	The proposal must be delivered to the State no later than the Response Deadline specified in Grant Funding Announcement Section 5, Schedule of Events.		
			al must NOT contain any restrictions of the rights of the er qualification of the response.		
		A proposal r	nust NOT submit alternate responses.		
1	A.1.	Provide the Statement of Certifications and Assurances (Grant Funding Announcement Attachment C) completed and signed by an individual empowered to bind the proposer to the provisions of this Grant Funding Announcement and any resulting grant contract. The Statement of Certifications and Assurances must be signed without exception or qualification.			
1	A.2.	Provide a statement, based upon reasonable inquiry, of whether the proposer or any individual who shall cause to deliver goods or perform services under the grant contract has a possible conflict of interest (e.g., employment by the State of Tennessee) and, if so, describe the nature of that conflict.  NOTE: Any questions of conflict of interest shall be solely within the discretion of the State, and the State reserves the right to cancel any award.			
State Use – G	rant Coo	rdinator Signa	ature, Printed Name & Date:		

#### **TECHNICAL RESPONSE & EVALUATION GUIDE**

**SECGENERAL QUALIFICATIONS & EXPERIENCE.** The Respondent must address all items detailed below and provide, in sequence, the information and documentation as required (referenced with the associated item references). The Respondent must also detail the response page number for each item in the appropriate space below. Proposal Evaluation Team members will independently evaluate and assign one score for all responses to Section B— General Qualifications & Experience Items found below.

RESPONDENT LEGAL ENTITY NAME:		ENTITY	America Works of Tennessee, Inc.		
Response Page # (Respondent completes)	Item Ref.	Section B— General Qualifications & Experience Items			
1	B.1.		ame, e-mail address, mailing address, telephone number, and facsimile number on the State should contact regarding the proposal.		
1	B.2.		e proposer's form of business ( <i>i.e.</i> , individual, sole proprietor, corporation, non-ration, partnership, limited liability company) and business location (physical domicile).		
1	B.3.	Detail the n	umber of years the proposer has been in business.		
1	B.4.		cribe how long the proposer has been providing the goods or services required nt Funding Announcement.		
1	B.5.	Describe th	Describe the proposer's number of employees, client base, and location of offices.		
1	B.6.	Provide a statement of whether there have been any mergers, acquisitions, or change of control of the proposer within the last ten (10) years. If so, include an explanation providing relevant details.			
1	B.7.	proposer's delivery of g Announcer	Provide a statement of whether the proposer or, to the proposer's knowledge, any of the proposer's employees, agents, independent contractors, or subcontractors, involved in the delivery of goods or performance of services on a contract pursuant to this Grant Funding Announcement, have been convicted of, pled guilty to, or pled <i>nolo contendere</i> to any felony. If so, include an explanation providing relevant details.		
1	B.8.	Provide a statement of whether, in the last ten (10) years, the proposer has filed (or had filed against it) any bankruptcy or insolvency proceeding, whether voluntary or involuntary, or undergone the appointment of a receiver, trustee, or assignee for the benefit of creditors. If so, include an explanation providing relevant details.			
1	B.9.	that the pro contract red material ad separately, whether an pursuant to NOTE: All the propose	tatement of whether there is any material litigation pending against the proposer poser should reasonably believe could adversely affect its ability to meet grant quirements pursuant to this Grant Funding Announcement or is likely to have a verse effect on the proposer's financial condition. If such exists, list each explain the relevant details, and attach the opinion of counsel addressing d to what extent it would impair the proposer's performance in a grant contract this Grant Funding Announcement.  persons, agencies, firms, or other entities that provide legal opinions regarding er must be properly licensed to render such opinions. The State may require the submit proof of license for each person or entity that renders such opinions.		

RESPONDENT LEGAL ENTITY NAME:		ENTITY	America Works of Tennessee, Inc.	
Response Page # (Respondent completes)	Item Ref.	Section B— General Qualifications & Experience Items		
2	B.10.	Commissio explain the what extent	Provide a statement of whether there are any pending or in progress Securities Exchange Commission investigations involving the proposer. If such exists, list each separately, explain the relevant details, and attach the opinion of counsel addressing whether and to what extent it will impair the proposer's performance in a grant contract pursuant to this Grant Funding Announcement.	
		NOTE: All persons, agencies, firms, or other entities that provide legal opinions regarding the proposer must be properly licensed to render such opinions. The State may require proposer to submit proof of license for each person or entity that renders such opinions.		

#### **TECHNICAL RESPONSE & EVALUATION GUIDE**

**TECHNICAL QUALIFICATIONS, EXPERIENCE & APPROACH.** The proposer must address all items (below) and provide, in sequence, the information and documentation as required (referenced with the associated item references). The proposer must also detail the response page number for each item in the appropriate space below. A Proposal Evaluation Team, made up of three or more State employees, will independently evaluate and score the response to each item found below. Each evaluator will use the following whole number, raw point scale for scoring each item:

0 = little value 1 = poor 2 = fair 3 = satisfactory 4 = good 5 = excellent

The Grant Coordinator will multiply the Item Score by the associated Evaluation Factor (indicating the relative emphasis of the item in the overall evaluation). The resulting product will be the item's Raw Weighted Score for purposes of calculating the section score as indicated.

RESPONDENT LEGAL ENTITY NAME:		L ENTITY	America Works of Tennessee, Inc.			
Response Page # (Respondent completes)	Item Ref.		Section C— Technical Qualifications, Experience & Approach Items		Evaluation Factor	Raw Weighted Score
2	C.1.		rrative that illustrates the proposer's og of the State's requirements and project		1	
2	C.2.	complete the	rrative that illustrates how the proposer will scope of services, accomplish required nd meet the State's project schedule.		2	
8	C.3.	manage the	Provide a narrative that illustrates how the proposer will manage the project, ensure completion of the scope of services, and accomplish required objectives.		2	
10	C.4.	each of the formal each of the formal each of the formal each mark 2. Fact that 3. Pre-	Provide a description of the proposer's experience at each of the following:  1. Assessing an individual's job compatibility and connecting individuals on career paths that lead to sustainable income based on the labor market needs;  2. Facilitating job search efforts for individuals that lead to employment; and		3	
11	C.5.	Provide a description of the proposer's experience in assessing and providing job services to individuals that have limited or no proficiency in English.		2		
12	C.6.	Describe the proposer's approach to career coaching, detailing the types of job retention services the proposer will offer to populations that traditionally have had difficulty sustaining employment.		3		
12	C.7.	American Jo (WoRC) Ope	proposer's existing relationships with local b Centers, WoRC Readiness Component erators, and other appropriate community can connect individuals with employment		2	

RESPONDENT LEGAL ENTITY NAME:

America Works of Tennessee, Inc.

Response Page # (Respondent completes)	Item Ref.	Section C— Technical Qualifications, Experience & Approach Items		Item Score	Evaluation Factor	Raw Weighted Score
		opportunities.				
13	C.8.		Describe the proposer's existing relationships with vocational training programs, certificate programs, apprenticeship programs, or the like.		2	
13	C.9.	Describe the proposer's approach to identifying high demand fields offering increased wage opportunities and assisting individuals in aligning their skills and training with these fields to take maximum advantage of employment opportunities.			3	
13	C.10.	Describe proactive measures the proposer intends to implement to assist individuals to overcome barriers to employment such as mental or physical health challenges, history of substance abuse, criminal history, transportation difficulties, lack of work experience, etc. Discuss 1) the process by which individuals will request supportive services from the proposer to address such barriers, and 2) the proposer's process for requiring and tracking receipts for such supportive services.		3		
14	C.11.	Describe the proposer's quality assurance processes and related infrastructure. Explain the proposer's internal monitoring processes for financials, including case documentation. Describe the frequency of internal monitoring reviews and what strategies the proposer will apply to improving service delivery and utilization control.				
15	C.12.	Describe the proposer's approach to monitoring individuals' participation in core and/or non-core work activities.				
The Solicitation Coordinator will use this sum and the formula below to calculate the section score. All calculations will use and result in numbers rounded to two (2) places to the right of the decimal point.  Total Raw Weighted Score: (sum of Raw Weighted Scores above)						
	Total Raw Weighted Score X 50  Maximum Possible Raw Weighted Score (maximum possible = SCORE:					
	(i.e., 5 x the sum of item weights above) score)					
State Use – Ev	State Use – Evaluator Identification:					

State Use – Grant Coordinator Signature, Printed Name & Date:

#### STATEMENT OF CERTIFICATIONS AND ASSURANCES

The proposer must sign and complete the Statement of Certifications and Assurances below as required, and it must be included in the proposer's proposal.

#### The proposer does, hereby, expressly affirm, declare, confirm, certify, and assure ALL of the following:

- 1. The proposer will comply with all of the provisions and requirements of the Grant Funding Announcement.
- 2. If selected, the proposer will provide all services as defined in the Scope of the Grant Funding Announcement Attachment A, *Pro Forma* Grant Contract for the total Grant Contract Term.
- 3. The proposer accepts and agrees to all terms and conditions set out in the Grant Funding Announcement Attachment A., *Pro Forma* Grant Contract.
- 4. The proposer acknowledges and agrees that a grant contract resulting from the Grant Funding Announcement shall incorporate, by reference, all proposal responses as a part of the Contract.
- 5. The proposer will comply with:
  - (a) the laws of the State of Tennessee;
  - (b) Title VI of the federal Civil Rights Act of 1964:
  - (c) Title IX of the federal Education Amendments Act of 1972;
  - (d) the Equal Employment Opportunity Act and the regulations issued there under by the federal government; and.
  - (e) the Americans with Disabilities Act of 1990 and the regulations issued there under by the federal government.
- 6. To the knowledge of the undersigned, the information detailed within the proposal submitted to this Grant Funding Announcement is accurate.
- 7. The proposal submitted in response to this Grant Funding Announcement was independently prepared, without collusion, under penalty of periury.
- 8. No amount shall be paid directly or indirectly to an employee or official of the State of Tennessee as wages, compensation, or gifts in exchange for acting as an officer, agent, employee, subcontractor, or consultant to the proposer in connection with this Grant Funding Announcement or any resulting grant contract.
- 9. The proposal submitted in response to this Grant Funding Announcement shall remain valid for at least 120 days subsequent to the Response Deadline established in Section 5 of the Grant Funding Announcement and thereafter in accordance with any grant contract pursuant to the Grant Funding Announcement.
- 10. The proposer affirms the following statement, as required by the Iran Divestment Act Tenn. Code Ann. § 12-12-111: "By submission of this bid, each bidder and each person signing on behalf of any bidder certifies, and in the case of a joint bid each party thereto certifies as to its own organization, under penalty of perjury, that to the best of its knowledge and belief that each bidder is not on the list created pursuant to §12-12-106." For reference purposes, the list is currently available online at: <a href="https://www.tn.gov/generalservices/procurement/central-procurement-office-cpo-/library-/public-information-library.html">https://www.tn.gov/generalservices/procurement/central-procurement-office-cpo-/library-/public-information-library.html</a>.

By signing this Statement of Certifications and Assurances, below, the signatory also certifies legal authority to bind the proposing entity to the provisions of this Grant Funding Announcement and any grant contract awarded pursuant to it. If the signatory is not the proposer (if an individual) or the proposer's corporate *President* or *Chief Executive Officer*, this document <u>must</u> attach evidence showing the individual's authority to bind the proposer.

#### DO NOT SIGN THIS DOCUMENT IF YOU ARE NOT LEGALLY AUTHORIZED TO BIND THE PROPOSER

SIGNATURE:	& Ban S
PRINTED NAME & TITLE:	Lee Bowes

DATE: April 29, 2019

PROPOSER LEGAL ENTITY NAME: America Works of Tennesee, Inc.

#### Section A – Mandatory Requirement Items

**A.1** Please see the Statement of Certifications and Assurances attached.

**A.2** America Works of Tennessee, Inc. ("AWTN") is a member of the America Works network of companies (hereto referred as 'AW'), which are a constellation of legally separate entities with shared ownership. No member of AWTN or AW has a possible conflict of interest regarding this submission or any resulting contract.



#### Section B – General Qualifications & Experience

B.1 Contact Person: Dr. Lee Bowes, CEO Email address: lbowes@americaworks.com Mailing Address: America Works of Tennessee, Inc. HQ: 228 East 45th Street, 16th Floor New York, NY 10017

Telephone Number: 212-599-5627 Fax Number: 212-599-5170

**B.2** America Works of Tennessee, Inc. is a for-profit Subchapter S-Corporation.

Memphis Office: 22 North Front Street, Suite 1030A

Memphis, TN 38103

Nashville Office: 3200 West End Ave, Suite 550

Nashville, TN 37203

National Headquarters: 228 East 45th Street, 16th Floor

New York, NY 10017

**B.3** America Works of Tennessee, Inc. has been in business for six (6) years.

B.4 AWTN is the current ECMS program provider in Shelby County, which it has operated since January 2018. Additionally, since July 2018, AWTN has been operating the Youth Work Experience Program for the Workforce Investment Network (WIN) – the Memphis Region workforce development board. AWTN has also operated as a Ticket-to-Work programs in Nashville since 2013 and in Memphis since 2016. Ticket-to-Work ("TTW") is a national program that provides workforce development services to SSI/SSDI beneficiaries.

Nationally, AW has been performing workforce development services for public assistance beneficiaries for thirty-five (35) years, and today operates in twelve (12) states and the District of Columbia. Since 1984, the AW network has operated myriad of programs focusing on low-income and public assistance recipients, helping over one million individuals find employment and begin new careers.

**B.5** As stated in B. 2., AWTN has offices located in:

Memphis: 22 North Front Street, Suite 1030A Nashville: 424 Church Street, 20th Floor

Memphis, TN 38103 Nashville, TN 37219

Combined between the two offices, AWTN employs 20 employees. As an ECMS, TTW, and Youth Work Experience provider, AWTN serves high-needs populations including TANF and SNAP recipients; SSI/SSDI beneficiaries; veterans; out-of-school out-of-work (OSOW) youth; justice-involved individuals; skills deficient individuals; individuals with limited work history; dislocated workers; individuals with Limited English proficiency; foreign-born individuals.

On a national scale, AW operates contracts providing employment services to TANF applicants and recipients in five (5) states, plus the District of Columbia: New York; Washington, D.C.; Maryland; New Jersey; Tennessee; Wisconsin. AW also operates three (3) Food Stamp Employment and Training (FSET) contracts, four (4) re-entry contracts for justice-involved individuals, three (3) Homeless Veterans Reintegration Program contracts, offers TTW services in all 25 offices, has five (5) WIOA youth contracts, two (2) WIOA Adult and Dislocated Worker contracts, and two One-Stop Operator contract. AW has twenty-five (25) locations across twelve (12) states plus the District of Columbia, and employs over 260 staff members nationwide. AW operates both mandated and voluntary programs.

- **B.6** AWTN and AW have not experienced any mergers, acquisitions, or change of control within the last ten (10) years.
- **B.7** None of AWTN's employees, agents, independent contractors or subcontractors proposed to provide work on a contact pursuant to this RFP have been convicted of, pled guilty to, or pled nolo contendere to any felony. AWTN and the AW network conduct extensive background checks on employees prior to hire.
- **B.8** AWTN and the AW network have never filed or had filed against, any bankruptcy or insolvency proceeding. AWTN and the AW network have never undergone the appointment of a receiver, trustee, or assignee for the benefit of creditors.
- **B.9** No pending litigation against America Works of Tennessee, Inc. or the AW network exists.

**B.10** There is no pending or in progress Securities Exchange Commission investigations involving AWTN or the AW network.

#### Section C - Technical Qualifications, Experience, and Approach

**C.1** As demonstrated by its past sixteen (16) months of operating the ECMS program in Shelby County, AWTN understands the State's requirements for the ECMS program as well as the project schedule outlined by the State. We understand that all program requirements must be met and we are capable of delivering services to all clients, because we have the necessary resources already in place to serve all clients in the Greater Memphis Region and the institutional knowledge to build even more resources throughout the contract term. AW has been providing welfare-to-work services since the 1984. Through a strengths-based client-centered program model, **the AW network has helped over one million individuals transition into employment.** AWTN works tirelessly to ensure that each client we serve is fully engaged in work activities coupled with intensive case management using a Two-Generation (2-Gen) Approach to ensure that our clients reach self-sufficiency and achieve sustainable family outcomes.

AWTN understands that the State will begin making referrals to contractors on July 1, 2019, and that the length of the contract is one (1) year, concluding June 30, 2019. AWTN already has the staff, space, partnerships, institutional knowledge as well as policies and procedures in place to help families access the education, health, and supportive service resources they need right away in July 2019, continuing through the life of the contract.

The AW network has a demonstrated understanding of and commitment to a Two-Generational Approach to achieving cycles of success in adult and child recipients of TANF, having done so during its current ECMS contact for DHS in Shelby County as well as in other programs nationwide such as for the District's Department of Human Services in Washington, D.C, which it has been serving under a 2-Gen Approach since 2012.

**C.2** Having served the people of Tennessee for six (6) years, with one year as the ECMS provider for Shelby County, AWTN has developed close relationships with the network of family, health, and workforce development service providers that are instrumental in producing sustainable family outcomes. Its model of workforce services has proven effective over the course of its thirty-five (35) year history, during which time AW has placed over one million individuals in new careers.

Two-Generation Approach: AWTN's case management focuses on the four (4) core component activities of the 2-Gen Approach: *Educational Success; Workforce Development and Economic Assets, Health and Well-Being, and Social Capital.* AWTN's DHS approved orientation extensively covers available resources in all four (4) categories, with regularly updated brochures and other written material in order to provide clients with a visual reference they can use when interacting with case management staff. AWTN staff have been active in Shelby County throughout their ECMS contract period, developing person-to-person relationships between front-line staff and their counterparts as well as between administrators. These relationships facilitate referrals by providing a virtual "warm hand-off" and makes it easier for AWTN staff to track client participation in barrier removal activities. They have also been essential to the success of AWTN events, reflecting the extent of resources available to clients through ECMS at AWTN.

*Educational Success:* For clients with young children, the Career Coach educates them on local early childhood programs to promote kindergarten and school readiness when they meet with them one-on-one during Individual Opportunity Plan (IOP) formation. AWTN's Family Resource Specialist has helped AWTN develop relationships with early childhood providers with

whom AWTN helps clients enroll their children ages birth to five (5) years. AWTN regularly exceeds DHS Performance Measurement Outcomes (PMOs) for early childhood enrollment by nearly double., as the performance chart for PY 2019 Q1 demonstrates.

AWTN works with a strong network of adult education providers to offer literacy development opportunities across the age spectrum. Organizations from local technical colleges such as Concorde Career College; National College; Moore College of Technology speak to clients onsite during orientation and set up information booths to answer any questions clients may have and help them enroll. AWTN will continue to engage clients and local providers of early

	Performance Measurement Outcome Conf			
ECMS PMO 1	Clients shall obtain a postsecondary degree within 2 years of enrollment in an accredited educational program	<b>70</b> %	No Data	
ECMS PMO 2	Pre-school aged children of clients are engaged in quality early childhood program	50%	74.5%	
ECMS PMO 3	Clients shall obtain a postsecondary certification within 18 months of enrollment in an accredited educational program	40%	100%	
ECMS PMO 4	Clients shall obtain a postsecondary degree within 2 years of enrollment in an accredited educational program	40%	100%	
ECMS PMO 5	Clients shall obtain a postsecondary degree within 4 years of enrollment in an accredited educational program	40%	No Data	
ECMS PMO 6	Clients who receive a postsecondary certification of degree shall obtain full-time employment related to their field of study or in a professional career within 3 months of program completion or within 3 months from orientation date if the Client has a postsecondary degree or certification at the time of referral.	40%	100%	
ECMS PMO 6	Clients who obtain full-time employment and FF case closed due to earned income shall remain closed for greater than 6 months	30%	89.2%	

childhood and adult literacy education in all counties of service, to bring them on-site to the local AWTN location order to achieve continued success in meeting PMOs for early childhood enrollment and client measurable skill gains.

Workforce Development and Economic Assets: The Career Coach uses knowledge of the local job market and employer needs, or Labor Market Information (LMI), as well as information about the client's strengths, employment history, education, and interests to help the client develop achievable career goals. Client career goals have both short and long-term objectives along a defined career path that may involve both occupations with progressive levels of skill development and responsibility as well as education and training that will aid in progressive skill development.

AWTN Site Director, Bret Stockton, as well as Program Manager, Demeshia Brock, and the business development staff meet at least quarterly with Roderick Woody from the WIN and a representative from the Tennessee American Job Center – Memphis to discuss local labor market needs. These meetings include representatives sent from local employers who help direct local workforce by influencing the trainings AWTN and local workforce partners develop as well as the existing trainings in which AWTN encourages clients to enroll. Additionally, staff meets with the One-Stop Operator Coordinator, who shares an extensive and up-to-date list of available jobs by sector, which is in turn shared with clients. As a result of these partnerships, clients enjoy many new opportunities, such as the ability to enroll in courses at the WIN. AWTN is committed to continuing the success that

has come from regular engagement with local workforce partners and employers and ensuring representatives from employers and the American Job Center (AJC) network in Fayette, Lauderdale, and Tipton Counties also contribute to the discussion.

AWTN has extensive partnerships with community agencies in the Greater Memphis Region that offer free financial management classes, tax preparation, and basic banking knowledge. Many of these partnerships were established through AWTN's TTW program and have continued to be an essential asset for ECMS clients. Some of these partners include Operation Hope, Memphis Area Legal Services, University of Memphis Law Service, and Fort Sill National Bank, which waives all bank account fees for AWTN participants.

Organization	Services Offered
Assurance Wireless (Lifeline Assistance Program)	Free android smartphone, free monthly data, unlimited texts and montly minutes
Behavioral Health Initiatives	Mental health evaluations, counseling, etc.
Family Safety Centers	Assistance for victims of domestic violence
Southern College of Optometry America's Best Contacts and Eyeglasses	Eye exams, vision services
Hickory Hill Dental Practice Christ Community Health Services	Dental services
CHIPS Memphis	AIDS / STD screening
A Step Ahead Foundation	Birth Control, Women's Health

For clients age twenty-two (22) or younger or who have children ages fourteen (14) through twenty-two (22), AWTN is able to refer them to their local American Job Center for intake and enrollment in to the WIOA programming for In-School or Out-of-School Youth, as appropriate. As a Youth Work Experience provider for the WIN, AWTN has relationships with individuals that serve youth in AJCs throughout the Greater Memphis Area – facilitating the referral of clients and their family to youth career preparation and employment services.

Health and Well-Being: During orientation, all clients receive information on how to gain access to community health centers as well as local physical, mental, dental, and behavioral health services to meet their individual needs. During IOP formation, the Career Agent delves deep in to the overall health and well-being of clients and provides individualized coaching on how to live a healthier lifestyle. AWTN has comprehensive knowledge of local health initiatives, in part from the work of the Family Resource Specialist who has built relationships with a wide-ranging set of providers, including those seen in the chart. AWTN holds at least three (3) empowerment workshops a year, where local community partners come on-site to educate clients and their families on topics such as managing stress, impact of toxic stress, impact of adverse childhood experiences, executive functioning skills, etc. to improve the overall health and well-being of the family.

Social Capital: AWTN works with clients and their families to achieve and appreciate their social capital via hosting opportunities for the client and the family to meet other clients and families to share knowledge of civic engagement activities, community services/projects, and community resources and to provide each other with social and emotional support, at least quarterly. These opportunities have included events such as a "Family Fun Day," where clients and families participated in community-building. Another recent event was a Fashion Show on April 4, 2019, in which clients were able to network with employers, community partners, and access business professional clothing. AWTN also refers clients to local or school-based mentor groups and community programs.

Ongoing Case Management: AWTN believes in the irreplaceable role of face-to-face communication in case management, as well as the importance of continued engagement pre- and post-employment. Intensive retention services are a hallmark of the AW network model, and have set AW apart from other workforce service providers in employment and job retention results from the beginning of the Company's thirty-five (35) year history. AWTN Career Coaches maintain contact with the client

throughout the case management period through a variety of communication methods, including phone, e-mail, text SMS, and messaging applications. By communicating regularly with the client—at least weekly during assigned activities and through the first few months post-employment — Career Coaches and clients have an easier time setting and maintaining monthly appointments for face-to-face meetings at the AWTN office. During these meetings, Career Coaches assess the client's progress IOP goals and make ancillary referrals as appropriate to community services such as tutoring, Imagination Library, public health department, community mental health services, parenting classes, individual or family coaching, child enrichment programs, mentoring programs, career centers, Career / Employment fairs, employment trainings, employment leads and opportunities to increase wage earnings, work experience and community service placements, youth summer employment programs, asset building programs, housing supports, or Family Focused Solutions (FFS) services.

AWTN makes two attempts to reschedule in the event a client is unable to attend the monthly face-to-face meetings due to work, school schedule, childcare, or other personal or family emergencies, offering alternative meeting times each time to work with the client's schedule. AWTN conducts the meeting via telephone only as a last resort. AWTN understands the importance of careful documentation of all client interactions, and ensures Career Coaches record all attempts to reschedule meetings in the State system, and reason for conducting meetings via telephone if necessary. The results of meetings are also entered on the client's IOP, including any Barriers identified, resources offered to address the barriers, and outcome of the resource referral.

Families First and WIOA: Through the current ECMS contract period, AWTN Business Developer Dillon Holliman has been on-site at the Tennessee American Job Center – Memphis Downtown twice per week to connect ECMS clients to One Stop resources. While Mr. Holliman has recently been transferred full-time to the Youth Work Experience program, AWTN will hire a Family Resource Specialist that will be present at the Tennessee American Job Center – Memphis Downtown as well as other American Job Center locations. The new hire will benefit from Mr. Holliman's tutelage, ensuring AWTN has the connections and expertise to offer effective referrals and consultation on One Stop resources to ECMS clients.

AWTN has MOU agreements with the partners present at the One Stop listed below. These partners are responsible for having staff on-site at the One Stop who are appropriately trained to provide information to clients about the programs, services, and activities available through partner programs.

AWTN has established a formal electronic referral process to the AJC for TANF customers in Shelby County and the Greater Memphis Region. The referral process includes a single point of contact from AWTN and the America Job Center (AJC) to ensure service coordination and collaboration. Every referral includes an email from AWTN staff to the AJC contact, followed by a phone call in order to ensure clients are connected to appropriate services.

#### Parties to the One Stop System Partner MOU:

- DB Grant Associates
- HopeWorks
- State of Tennessee Department of Labor and Workforce Development
- Meritar
- Shelby County Office of Re-Entry
- Tennessee Department of Human Services

### **Principles of One Stop Partners:**

- Universal Eligibility
- One State System Approach
- Individual Choice
- Regional Development
- Cost Effectiveness

AWTN coordinates with the WIN to help it meet the vision of the State outlined in its Jobs4TN plan. AWTN Site Director, Bret Stockton, meets with the WIN at least quarterly to help the WIN develop the Tennessee WIOA MOU for the service delivery model and operational budget agreement. The resulting invoice to DHS is reviewed by AWTN Chief Financial Officer (CFO) Mark Mackler, who must sign off on it.

Federal and State Families First/TANF Work Requirements: Case management, the central function of an ECMS provider, focuses on helping families achieve economic stability through quality pathways to education and employment for the parent, quality learning for the child, and the development of support through community resources and local providers. AWTN is committed to providing these services in a central location so that no client must travel more than forty (40) miles to access services. This is achieved through a facility in downtown Memphis serving Shelby County, as well as ECMS services on-site at the DHS offices of Fayette, Lauderdale, and Tipton Counties.

AWTN is committed to ensuring every client engages in at least twenty (20) hours of core work activities, including job readiness assistance and job search, work experience (WEX), community service program (CSP), vocational educational training, and unsubsidized employment. As the current ECMS provider in Shelby County, AWTN is familiar with the required core and non-core component activities of ECMS under state and federal guidelines. AWTN will also assign adult education and job skills training directly related to employment for up to ten (10) of the required thirty (30) total hours according to client needs.

AWTN ensures client's assigned activities and allotted time reflect the best strategy for success along their identified career path in the IOP. AWTN is committed to diligent and accurate documentation of participation in assigned work activities. While AWTN uses proactive contact methods to keep clients engaged and re-engaged, AWTN records and reports any failure to comply, and attempts to engage non-compliant clients within a five-day business period. AWTN sends a written notice to the

client while keeping a copy in the client's file in the State system. AWTN makes at least two attempts to contact the client by phone at different times of the day each time, documenting each engagement attempt in the State system within twenty-four (24) hours. AWTN schedules an appointment with the client no later than (10) days after the date of contact. If the client does not make contact or attend the rescheduled appointment, or fails to show for any activity during a two-week period following reconciliation, AWTN refers the case back to the State. AWTN later reviews the case in the State system to ensure the State's Client Representative has documented the outcome of its determination. Staff sometimes discover hidden barriers during their outreach to noncompliant clients. In these cases, AWTN links these clients with the necessary supportive services and counseling. Career Coaches and Business Developers can then effectively customize the ECMS program for the client to ensure future success, including putting together updated IOPs which are closely monitored by the Career Coaches, providing job placement opportunities which accommodate the client's unique scheduling needs, including 2nd or 3rd shift work or part time employment as the client works towards full time employment.

AWTN has developed an engaging and comprehensive orientation for clients so they are immediately inspired and motivated. During orientation, clients learn about the program and the entire process at AWTN, from intake to post-employment. They also learn about DHS ECMS program policies and procedures and what is expected of them to remain compliant in the ECMS program. All aspects of the ECMS program are explained to the client to ensure they are aware of the activities they are required to partake in, such as job readiness assistance and job search; work experience; community service programs; vocational educational training; unsubsidized employment (private/public); and subsidized employment (private/public) and non-core activities including adult education and job skills training directly related to employment. AWTN staff provides an interactive oral orientation accompanied by a PowerPoint presentation displayed on a flat screen television to ensure that each client is thoroughly advised on DHS expectations program regulations, and consequences and terms of noncompliance. We advise clients on our intensive outreach approach and remind them that if there are any changes to their contact information during their enrollment to make AWTN immediately aware. The visual presentation also provokes questions and creates an interactive environment that begins to build the relationship between participant and AWTN personnel. Following the presentation, all clients are provided with a form acknowledging their understanding of the program goals, which client then signs.

Assessments and IOP: At its Memphis location, AWTN conducts orientation twice a day, two days per week, with an average of around 15 clients per orientation. AWTN prides itself on a "same-day service" service model whereby clients can expect to complete the IOP and assessments and receive work activity assignments the same day as orientation. The IOP is updated every three (3) months as necessary to reflect changing barriers, goals, and assignments. The Career Coach and client each sign and date the IOP and complete a Change of Activity form each time a change is made, with the updated IOP maintained in the client's case file and provided to the client. All updates are entered in to ACCENT the same day. Assessments are an important component of the intake process to ensure quality case management. Information from assessments and the intake interview dictates the development of the IOP by the client. All IOPs are completed in the client's hand-writing and are signed and dated by the client and Career Agent at the time of orientation. The client's assigned Career Agent then enters information from the IOP in to the emulator and ACCENT and puts it in the client's case file. For more information on assessments, see section C.4.

**Specific Assistance to Individuals**: Transportation can be a critical barrier to successful engagement in ECMS for clients, and so is discussed during orientation, the intake assessment interview, IOP development, and other points of contact. AWTN has a brochure that is distributed during Orientation that outlines in detail how clients may have necessary car repair costs covered, as well as other transportation payments that may be available such as gas cards and bus passes.

Family Resource Specialists engage local organizations and leverage community-based resources to supplement Support Services. If transportation or other barriers are identified, AWTN makes Support Services available to the client in accordance to the table in the Scope of Work Section A.16. AWTN does not provide support payments for measures covered by TennCare, Medicare, or other medical insurances, and works in coordination with the State's Representative to ensure no other resources are available. AWTN uses these measures, along with Support Services, to address barriers that are interfering with the client's ability to achieve employment/education goals. AWTN provides Support Services to clients not on its caseload as referred by DHS, such as refugees, vocational rehabilitation clients, or minor parent caretakers in high school. The provision of transportation assistance or other Support Services is documented in the client's case file and entered in to the State's System of Record same day.

Milestone Incentive Payments: AWTN explains incentive payments to clients during Orientation and the initial case management meeting and issues a brochure that includes the details. AWTN issues Incentive Payments to clients in the form of Target Gift Cards according to the payment schedule in A.23 of the Scope of Work. AWTN understands valid and current support documentation is required in order to receive reimbursement for Incentive Payments from the State.

Case File Maintenance and Documentation Requirements: AWTN has a long-standing history of developing and maintaining processes for monitoring client case files to ensure accuracy. Over the course of the past year, AWTN has worked with DHS to continually innovate and hone new practices to ensure the State has information needed to effectively monitor the ECMS program.

During intake, clients complete a barriers assessment, IOP, and O\*NET report as part of the Career Plan, and sign a document agreeing to participate in work assignments. All work assignment documentation lists the client's Fair Labor Standards Act (FLSA) information. The referral date is listed on the client's intake packet. AWTN Management reviews intake packets at the time of orientation to ensure that all requirements are met.

For clients who are not employed full-time, their Career Coach obtains weekly attendance verification logs showing what activity and how many hours of said activity the client completed that week. Clients employed full-time submit paystubs a minimum of once every two weeks. Whenever a client changes an activity, the client completes a Change of Activity Form as documentation of advance notice. This form must be signed at the AWTN office before it becomes part of the client's updated IOP. As mentioned previously, updates to the client's IOP are entered in to the emulator the same day, with all signed formed scanned in to ACCENT.

All employed clients must provide proof of employment to AWTN before they can receive credit for working. Career Coaches obtain Employment Verification Forms (EVFs) or use the Work Number database to prove the client is employed, entering all documentation in to the client's case file. Clients submit either paystubs or self-employment calendars to provide ongoing information about their employment.

For clients who are in school, AWTN requests an updated transcript or letters from the educational institution every semester the client is in school. AWTN uses attendance rosters as progress notes for community service sites or work experience sites to show the clients is consistently attending their assignments.

For missed hours, Career Coaches are required to print off the attendance record from the State's System of Record and place it behind the attendance verification form the client submitted. If a client did not turn in an attendance verification form, the Career Coach is required to create one to be placed in the case file. Any excuse notes the client may have are required to be included behind the attendance verification form and the printed screen from the State's System of Record.

AWTN inputs all supportive service and incentive request into Salesforce and does not distribute supportive services or incentives unless the request is put in through Salesforce. AWTN completes a monthly report in Salesforce of all supportive services and incentives and places documentation of the supportive services and incentives provided into client's files.

Whenever a client is enrolled in an initial orientation, Jonah Kaufman, the IT/Quality Assurance Support Analyst, places them in a hosted event in Salesforce, with Kirsten Stephens, Outreach Coordinator, placing them in subsequent events. When a client is in Conciliation, their status is updated in Salesforce by their Career Coach. At the end of each day, Mr. Kaufman runs a report in Salesforce that generates a letter informing the client that they have been scheduled for orientation or placed into conciliation. Two copies of all letters are made, one of which goes in the case file. All letters include date of creation.

Employment Verification and Income Calculation/ Work Verification Plan and Process: AWTN always verifies employment via one of three methods: Complete Paystubs, Work Number verifications, or Employment Verification Forms (EVFs) through secure E-Fax. For clients employed less than one month, AWTN uses a written employer verification form in the client's case file. Employer staff who can complete an EVF are typically a supervisor/manager, someone in payroll, or someone in human resources. The Billing Coordinator - a member of AWTN's independent finance team who has no incentive to obtain verification - communicates directly with the employer to verify employment for candidates following placement. The Career Coach/Specialist works with the Billing Coordinator to ensure the initial job start date, start title and hours per week has been appropriately completed and submitted. The job start date must be confirmed before the initial job reporting is entered.

After one (1) month AWTN obtains at least two (2) paystubs or third-party verification such as The Work Number. Employment verification on file is to stay up to date – not more than two (2) months old. Self-employed candidates will complete a self-employment calendar at least monthly as detailed in the Statement of Work part A.29. AWTN does not accept client statements of employment without supporting documentation. Incomplete employer statements, incomplete self-employment calendars, self-employment calendars where clients earn less than the minimum wage, pays stubs or third-party verification reports older than two months, or separation notes that do not include a start and end date, weekly hours, and wage are not accepted. AWTN immediately documents any changes to employment and wage status in the State system. AWTN uses the state-prescribed methodology to calculate employment wage-hours, reporting discrepancies to the State for income adjustment or correction to Families First (FF) case.

Active review of activity and attendance logs are an essential component of effective and responsible case management. AWTN reviews weekly logs to ensure activity hours align with the IOP or career plan in the State system, and evaluates client progress, ensuring assigned components are in line with State mandated hours for Core and non-Core activities. AWTN follows state guidelines for holidays and excused absences. AWTN maintains timely entry of activities, with all activity hours entered in to the State system within five (5) business days for the previous week of activities or as changes occur with the client's work activity.

All documentation to support data and client compliance information reported in the State system is available to the State for verification upon request.

Client Engagement/Client Conciliation: Throughout the pre- and post-employment period of ECMS services, the Career Coach meets with clients face-to-face at least monthly to discuss and assess client and family progress in work, education, health, and social well-being. During the monthly meeting, the Career Coach reassesses barriers, providing appropriate resources when necessary. The Career Coach also assesses progress against IOP goals. Employed clients receive assistance / coaching on employment skills to help achieve more hours, higher wages, and promotions. Career Coaches maintain flexible hours to accommodate working or education-enrolled clients outside of normal business hours. Meetings may be done over the phone if an in-person meeting would present an unsolvable barrier for the client. After job placement all clients receive coaching by their Career Coach on incentive payments, transitioning off benefits, job-related benefits, career planning, and financial planning. The Career Coach contacts the client several times per week through the first one to two months of employment to provide encouragement and ensure the client is adjusting well to their new work environment.

As detailed under 'Federal and State Families First/TANF Work Requirements', AWTN contacts clients the next business day after non-compliance is found, and ensures non-attendance hours are documented on the attendance record screen and running records case note screen in the client's case file in ACCENT. A written notice is sent to inform the client of non-compliance, and a copy of the conciliation letter is placed in the client's case file. The Career Coach immediately documents that the notice was sent in the emulator. The Career Coach makes a minimum of two attempts to contact the client by telephone on different days and at different times. When needed, AWTN uses the State's Client Representative as a partner for assistance contacting the client if other methods fail. If the client does not contact AWTN and does not attend the rescheduled appointment within the consecutive five-business day period, AWTN refers the case back to the State. AWTN later reviews the case in the State system to ensure the State's Client Representative has documented the outcome of its determination.

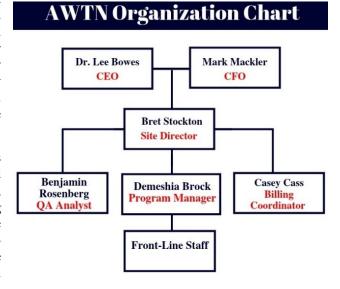
Work Incentive Payment Program: During orientation, AWTN makes clear what clients' options will be should they become employed and have their case closed from being over-income. This conversation is repeated during a subsequent case management meeting after the client becomes employed. AWTN distributes a brochure clearly stating the pros and cons between the Work Incentive Program (WIP) and Transitional Food Stamps (TFS) and gives details of the requirements and benefits of each. The client's Career Coach continues to monitor work activity engagement monthly while the client is enrolled in WIP, providing support services as needed.

Training, Confidentiality Requirements, and Data Security Protocol: AWTN treats security of data and client confidentiality with the utmost seriousness and engages with the State and district partners to ensure procedures are in compliance with the latest best practices and State security protocol by participating in all State-required trainings and attending collaborative meetings. In thirty-five (35) years of operation the AW network has never had a breach resulting in the release of sensitive client information, but nonetheless is committed to implementing the highest standards of physical, technological, and

institutional measures to stay ahead of growing threats. All changes in state requirements are communicated to all relevant staff. In addition to annual training in program requirements and guidelines, staff with access to the State system are required to complete a Computer Security Agreement, State computer security training, and any refresher training as needed. AWTN will notify the State immediately of any breaches or termination of staff with access to the State system. AWTN computers are compatible with State hardware and software and the organization maintains compatible e-mail accounts.

Staffing: AWTN's staffing in the Greater Memphis Region reflects the best arrangement for effective and efficient service to clients based upon State requirements. For internal order as well as transparency, AWTN maintains a detailed organization chart showing the reporting relationship and function of key staff members, available to the State upon request. AWTN staff are experienced in using a Two-Generation approach to assist and support FF clients or low-income families in increasing their economic security and stability. For a full list of staff positions, and organizational structure, please see below:

- Site Director
- Program Manager
- Quality Assurance Analyst
- Billing Coordinator
- IT/QA Support Analyst
- Front Desk



- Security/Office Support
- File Clerk
- Outreach Coordinator

- Trainer
- Family Resource Specialist
- Business Developer
- 8 Career Coaches

**PMOs** and **Program Activity, Postsecondary, and Supportive Services Reports**: AWTN has been consistently meeting or exceeding contracted PMOs, including for those for Educational Success and Workforce Development and Economic Assets. Mr. Kaufman generates the quarterly PMO reports using Salesforce. Career Coaches issue weekly reports to the Site Director, Bret Stockton, which include all information requested by the State in Program Activity Reports, Postsecondary Education Reports, as well as the Transportation, Support Services, and Incentive Payment Reports. Mr. Stockton compiles the information from the weekly reports from staff for submission to the State monthly. In the past year AWTN has issued every monthly and quarterly report to the State on time and responds to all inquiries and requests for clarification in a rapid and diligent manner.

**CAPs/Audits**: AWTN has a demonstrated history of responding effectively to Corrective Action Plans issued by the State, which have helped make the ECMS program more effective. AWTN understands that the aim of DHS is to improve client outcomes through a 2-Gen Approach, and that this may mean adjusting written policy in response to observed needs and concerns. Furthermore, AWTN has worked with DHS to both implement prescriptive plans, where DHS indicated specific processes they wanted to see, as well as innovated its own processes to meet DHS objectives. AWTN will continue to work closely with DHS to respond to directives as well as audit findings.

Project Schedule: AWTN is prepared to begin providing services July 1, 2019. As the current ECMS provider for Shelby County, AWTN has the infrastructure already in place to expand its scope of services to include Tipton, Fayette, and Lauderdale Counties. Upon award contract notification, the AWTN Recruiter, Keith Venters, will recruit for the open positions. AWTN enjoys a positive relationship with the current providers in these service areas and will give priority to the staff of these providers and will work with the current providers to garner their contacts, supportive service referrals, and other resources. AWTN is committed to recruiting staff with strong connections and roots in the community. Once these positions are filled, AWTN will ensure that all staff will attend corporate trainings, prior to the first day of the ECMS program operations on July 1, 2019. The newly hired Career Coaches will be trained on all program and fiscal policies and procedures, client case file maintenance and documentation, our internal case management system, Salesforce, along with a variety of other trainings aimed towards increasing cultural sensitivity and emotional intelligence, so that clients receive the highest level of care from Career Coaches. See program schedule below:

Program Schedule	Responsible Staff	Start Date	End Date
Develop a relationship with the DHS sites in Tipton, Fayette, and	Bret Stockton /	May 21, 2019	
Lauderdale Counties, ensuring that AWTN staff will work on site at	Demeshia Brock		
these DHS offices			
Advertise on Greater Memphis Area and Nashville Area Chamber	Keith Venters	May 31, 2019	June 6, 2019
of Commerce Online Job Boards, / Social Media			
Review resumes in response to job openings	Keith Venters	June 7, 2019	June 12, 2019
Interview and Conduct background checks	Bret Stockton	June 13, 2019	June 19, 2019
Hire Staff	Dr. Lee Bowes	June 19, 2019	June 21, 2019
Orientation for new staff to AWTN	Bret Stockton	June 24, 2019	June 24, 2019
Salesforce Training	Ryan Butler	June 25, 2019	June 25, 2019
Internal operational policies and procedure training	Bret Stockton	June 26, 2019	June 26, 2019
Sexual Harassment and Cultural Sensitivity Training	Bret Stockton	June 27, 2019	June 27, 2019
Motivational Interviewing Technique Trainings	Bret Stockton	June 28, 2019	June 28, 2019

**C.3** AWTN is committed to: a focus on reducing poverty among children and families using a 2-Gen Approach; the creation of effective pathways to economic opportunity, including access to mainstream education and training and individualized services for those with barriers to employment; the assurance that families have access to economic and social supports to support upward mobility, while also assuring healthy child development, and; to help families build social capital that can support both resilience and upward mobility. Using a traditional project management methodology, AWTN ensures the project leads to the aforementioned outcomes as prescribed by DHS.

AWTN is backed by the knowledge and prowess of AW, a national constellation of legally separate organizations that are supported by a senior management team with a collective century of experience in workforce development service delivery and innovation.

Dr. Lee Bowes joined AW as CEO in 1987. Since then, Dr. Bowes has been instrumental in expanding the network of companies which currently operates twenty-five (25) offices in twelve (12) states plus the District of Columbia. Since its inception in 1984, AW has placed one million individuals into employment. An active participant in the workforce development field, Dr. Bowes regularly works with elected officials and other workforce agencies to introduce and implement innovative employment concepts. Dr. Bowes provides administrative oversight of all activities of AWTN and is responsible for ensuring that all program requirements are met, including compliance and regulations.

Mark Mackler, CFO, is responsible for AWTN fiscal management. Mr. Mackler has been providing fiscal oversight for AW contracts, including work participation, placement, and support services, since 2009. He brings over thirty (30) years of experience in financial and accounting operations for private companies to his supervision of the AWTN Finance Department. Mr. Mackler also develops budgets for various requests for proposals from government agencies. Mr. Mackler provides direct oversight for all fiscal decisions and management.

Bret Stockton, with 20 plus years of leadership experience, joined AWTN in 2018 to serve as the Site Director for the new WIOA Employment and Case Management Services contract in Memphis. Mr. Stockton oversees the daily operations of the WIOA and TTW contracts, reviewing all progress-to-goal data. Mr. Stockton reports directly to CEO, Dr. Lee Bowes. Over the course of AWTN's first year in the ECMS program, Mr. Stockton helped the organization respond to DHS requests and implement new practices to best meet the needs of clients as well as state and federal requirements.

Demeshia Brock serves as the ECMS Program Manager for AWTN. A Memphis native, Ms. Brock has over 5 years management experience in leading multiple teams and contracts. Her passion for helping people is easily seen by her tireless efforts in support the clients and staff that she serves while overseeing the day to day operations of the TANF program. She reports directly to the Site Director, Bret Stockton.

AWTN has a stringent set of procedures in place regarding the documentation of all interactions of clients. As detailed in C.2, all client activities, actions, and needs are recorded in the individual case file. In addition to documenting all client information in ACCENT, AWTN uses Salesforce as its internal data base, which is compatible with many data management systems. By entering data and case notes in to an emulator, AWTN staff are able to enter information in to both ACCENT and Salesforce simultaneously without the need for double-entry. In addition, all forms requiring a signature are scanned directly in to ACCENT and Salesforce. This ensures that all staff are aware of the needs of each client. Once a reasonable accommodation is requested, the Corporate Representative notifies other staff members of the client's need. All activities are amended to ensure that the client can fully participate in the program and successfully prepare for the workforce.

As detailed later in C.11, AWTN has strict company-wide data entry and management requirements in place as part of its Project Management guidelines. During onboarding, AWTN staff undergo ACCENT system training administered by DHS. AWTN staff manage and track referrals, enrollments, work participation activities and hours, and the employment information and status of all clients. The Program Manager and Quality Assurance Analyst regularly conducts spot audits to ensuring accuracy, completion, and supporting documentation for all entered data in client case files. Staff are required to submit a Weekly Report to the Site Director each Friday. The Site Director reviews the data to as part of a system of checks and balances. If any discrepancies are identified, the responsible staff member meets with the Site Director to determine the cause and prevent any future issues. Should data discrepancies occur again, the responsible staff member will be required to undergo retraining. Additionally, AWTN utilizes Salesforce to internally report on activities, collect relevant service data, and track all key performance indicators. AWTN developed an emulator that allows staff to enter information in to the emulator and Salesforce simultaneously without the need for double-entry. AWTN CEO Lee Bowes oversees all program operations and receives weekly reports from Bret Stockton and provides program oversight to ensure compliance.

C.4 1. Assessing an individual's job compatibility and connecting individuals on career paths that lead to sustainable income based on the labor market needs: AWTN utilizes an array of assessments intended to identify an individual's strengths, interests, and career potential, including a State-Developed Barriers and Self-Sufficiency Assessment, TABE, O\*NET, and the VIA Survey of Character Strengths.

The State-Developed Barriers and Self-Sufficiency Assessment rates a client's level of need from "in crisis" to "empowered" in over 19 different areas of their life, including shelter/housing, employment, income, food & nutrition, childcare, children's education, adult education, healthcare, life skills, family relations/support network, transportation/mobility, community involvement, parenting skills, legal, mental health, substance abuse, safety, disabilities, and financial management. A career coach reviews the results of this assessment with the client and provides any possible resources for any barriers the client may have.

The client is given this assessment upon intake and is reassessed after 6 months and 1 year, to track progress and to make sure the client is receiving any necessary assistance to any barriers that might otherwise go unnoticed. Additionally, clients take the TABE test for Adult Basic Education, assessing their language and literacy skills and identifying any barriers.

AWTN also uses the O\*NET program, which is a primary source of occupational information for clients. O\*NET is an interactive web-based tool that suggests career matches in tune with an individual's interests and levels of experience. The O\*NET database contains information on hundreds of standardized and occupation-specific descriptors. The database is available to the public at no cost and is continually updated by surveying a broad range of workers from each occupation. O\*NET lets clients recognize that skills they obtained from other industries are transferable across different industry sectors and occupations and provides an alternative means to finding an attainable career path.

AWTN also uses AW's "Selling Your Strengths" curriculum, in which clients take the VIA Survey of Character Strengths from Dr. Seligman's Authentic Happiness program. The curriculum helps participants translate the results of the VIA Survey of Character Strengths to a professional setting, taking the results of the survey and coaching the participants on the professional keywords employers look for that match their strengths. Participants work with AWTN staff to build their personal brand, and work on an "elevator pitch" in addition to learning interview techniques and etiquette. Participants write, re-write, and rehearse their message so that each participant leaves with the ability to self-market during an interview or networking scenario.

In addition to career and strengths-based assessments, AWTN uses the most up-to-date labor market data, its relationship to the private sector, and employer partners to determine which industries and jobs can provide sustainable income for its clients. The AWTN Business Development Department is responsible for developing and maintaining industry relationships while utilizing employment projections, geographic distribution trends, and market information helps AWTN to determine viable target sectors and subsectors to invest its resources and business development activities. AWTN must also understand the standards these businesses have of clients to be prepared for employment in these sectors.

2. Facilitating Job Search Efforts That Lead to Employment: AWTN is well-versed in providing clients with both on-site and off-site job readiness services. AWTN understands that many clients will be referred "work ready" and those clients are provided a fast track approach. Subsequent to intake and orientation, "work ready" clients immediately begin meeting with Business Developers to be sent out on interviews for immediate job placement in their desired field or fields while being taught how to do active and effective independent job search as well. Clients placed in the fast track process bypass many of the barrier amelioration processes, as job ready participants will have few to no barriers. They are sent on interviews typically within a few days of being referred, if not the same day they complete enrollment. Clients who are placed in the fast track process system are typically placed in employment and begin working within the first one to two weeks of being referred to AWTN.

For clients who are not immediately work ready, after barrier assessment and amelioration, they begin Job-Readiness Training. AWTN's JRT consists of a two to four-week course, depending on the needs of individual clients, that is highly interactive to ensure clients are actively involved in the JRT. AWTN utilizes a tried and true method for JRT developed over the thirty-five (35) years of experience of AWTN and the AW network. JRT begins at intake, when the client comes referred to AWTN and meets with one of our Intake/Outreach Coordinators. As a part of intake, the client completes all required paperwork, including in-depth assessments such as abilities testing, barriers assessments and employment background materials that help gauge general work readiness. As part of this process, AWTN staff continues to update IOPs and clients receive core JRT programming, which focuses on "soft skills," time management and employee/employee expectations. Underemployed clients also undergo core JRT curriculum, with the ultimate goal of providing training to lead to hours or earnings increase that will lead to full employment.

The AWTN Trainer and Career Coach regularly monitors the client's progress in any on-site services, such as life skills courses; character strengths courses (upon approval form DHS); career etiquette skills courses, for example. All client interaction and progress is detailed in Salesforce case notes to ensure that a record of the length and progression of the client's activity is documented. For off-site services, such as substance abuse or domestic violence services, AWTN Career Coaches maintain constant contact with the appropriate agency contact person to ensure continued attendance and progression. Additionally, AWTN staff ensures to monitor all clients that are engaged in Job Search Activities to ensure that this is limited to four (4) consecutive weeks and twelve (12) weeks total in a year.

Clients are encouraged to visit Business Developers any time during their assigned Job Readiness Assistance and Job Search hours and may meet with multiple Business Developers in one day in order to get the highest chance of a successful job referral, as Business Developers develop relationships with different business partners. Business Developers also assist clients by coaching them on interview and presentation techniques. They are also able to conduct mock interviews and critique clients'

resumes to help them present the best version of themselves. Clients are also encouraged to conduct independent Job Search, either on of off-site. AWTN tracks off-site job search by having clients bring in documents such as business cards, job applications, or job announcements.

**3. Preparing Individuals for Entry and/or Re-Entry into the Work Place:** AWTN is experienced in assisting clients with little to no work experience, as well as clients who have been out of the work place for an extended period of time. AWTN provides clients with a number of resources, including many different Job Readiness Training opportunities, resume development, interview preparation, professional etiquette, provision of training and certification courses. Each month the workshops are updated to fit the needs, interests, and career goals of the clients.

Clients can choose from three tracks in AWTN's JRT. They can attend in-class workshops led by our trainer or another facilitator that focus on building both technical and soft skills, such as typing or computer literacy at America Works or through the AJC. Clients are also able to participate in career development trainings that focus on building essential job-related skills such as communication, emotional/social intelligence, and workplace diversity. If a client comes in with a particular goal or job in mind, the trainer is able to individualize their career plan. In the past, AWTN has organized targeted training programs designed for unique positions such as call center training or CVS Customer Service Training, giving clients the ability to not only able to learn the skills needed to thrive in a work environment, but to also build their professional network by interacting with individuals who share interests and goals.

AWTN works in coordination with workforce development partners in the region to provide clients with access to vocational training opportunities with reputable providers that lead to certifications and credentials that are in demand by local employers. AWTN refers clients whose IOP calls for vocational training to an AWTN Career Coach/Specialist located on-site at the local One-Stop at least two days per week, who then counsels the client on available training resources relevant to the client's career plan. Through the One-Stop, clients access eligible training providers using WIOA-funded Individualized Training Account (ITA) vouchers, helping to improve FF client employment outcomes while leveraging outside resources. In addition to working with the local workforce development system to link clients to available training opportunities, AWTN also delivers quality vocational training opportunities on-site. AWTN's close relationship with employers through its Business Developer team allows the company to identify skill needs in the local labor market. Furthermore, the AWTN curriculum is endorsed by numerous employers such as Shoprite and CVS Health, who have advised AWTN on which parts of customer service concepts the general workforce was lacking.

C.5 With programs in twenty-five (25) locations, including in some of the country's most diverse cities such as Los Angeles, New York City, and San Francisco, AW has well-established policies for meeting the needs of clients with Limited English Proficiency (LEP). AWTN's hiring practices ensure its staff includes employees with bi-lingual or multi-lingual proficiency able who are able to aid LEP clients when a language barrier is encountered. When a language barrier arises and a staff member with proficiency in the client's language is not available, AWTN uses an on-demand interpreter service LanguageLine, which offers over-the-phone interpretation (OPI), to communicate with the client, and has a career coach work with that client one-on-one. To make clients as comfortable as possible, AWTN gives them the option of bringing a trusted family member on site to serve as a translator.

Once language, education, and skills levels are identified, the Corporate Representative works with the clients to establish a plan on the best ways to ameliorate them. The AW network's first practice with all barrier removal is to provide services in-house, whenever possible. When not possible, the AW network uses its established network of partner social service providers to refer clients. Career Coaches work with the clients to determine which remedial and language courses are necessary to reach their personal and professional goals. AWTN then refers clients to English as a Second Language (ESL) courses at organizations such as Literacy Mid-South, Deneuville Learning Center, the Refugee Empowerment Program, and the Muslim Society of Memphis.

**C.6** AWTN recognizes that job success is determined from the start of services. The Four Pillars of AWTN's Service Model – job networks, strengths discovery, community support, and skill development, are all essential to ensuring the client will be able to maintain employment once they are on the job.



AWTN's Business Developers ability to connect clients to employers with whom they have a relationship is a critical part of what AWTN apart from other workforce providers. Rapport with the AWTN Business Developer often convinces company managers to have more patience and trust when training new hires, putting them in better position to succeed in a new environment. AWTN's strengths-based focus during work readiness is another critical element to ensuring job success later.

Selling Your Strengths not only helps participants find more quality job opportunities by aligning their search with jobs that fit their strengths, but also helps participants become more quality workers for employers. Selling Your Strengths is designed to help jobseekers develop the skill of being engaged and motivated in the workplace by identifying, promoting, and enhancing their greatest strengths in the context of a work environment. While having a quality job that aligns with a long-term career development strategy makes it easier to be engaged and motivated in the workplace, AWTN recognizes that ultimately this engagement is a skill in and of itself that can be developed and applied in any work environment.

Skill development includes both soft skills that apply across industries, as well as certified trainings that make clients more valuable workers. Many of AWTN's clients have limited or no work history and are unfamiliar with appropriate workplace etiquette. Clients who have experienced trauma, such as youth aging out of the foster system and formerly incarcerated individuals, sometimes need assistance with stress and anger management. Two important elements of soft-skills development include Time Management and Conflict Resolution, both of which are challenging for individuals with limited or no work history. Soft-skills is taught in a classroom setting, and clients engage in role play with each other, taking the position of both employer and employee. This enables clients to see different perspectives and recognize that they have control over their actions, and that their actions have consequences.

As detailed in C.8, AWTN has relationships with a host of local training providers who offer trainings in high demand industries. When clients have a certification that is in high demand, not only are they able to obtain a higher wage, but employers are more likely to work with them to resolve conflicts rather than terminating them prematurely.

Following job placement, AWTN staff proactively and consistently follow-up with clients, connecting them to community support when needed. The first few months of employment are particularly stressful as the clients adjust to a new lifestyle. Career Coaches will suggest that clients undergo **Post-employment assessments** once they are employed to identify if any social service referrals are needed to ameliorate new barriers and allow the client to stay focused on their job.

Most importantly, Career Coaches serve as workplace mediators between clients and their new employers. The Career Coach maintains regular contact with the employer and client for the first several weeks of employment. Should any issue or concern arise, the Career Coach steps in to act as a **workplace mediator**. For example, if a client is

continuously late to work because of unreliable childcare, the Career Coach will help the client in finding an alternate option. By acting as a liaison between the employer and client, the Career Coach reduces the likeliness of resignation or termination. AWTN celebrates clients' success by also offering financial **incentives for additional encouragement.** These include transportation fare in the form of gas or bus cards and gift cards for when the clients reach the retention milestone for continued employment of 30+ hours per week – typically at 30, 90, 180-days and 12 months. Clients appreciate the incentives, because they both help financially and show recognition for the tremendous obstacles that they have overcome.

C.7 AWTN has built close relations with staff and management at the AJCs of Shelby County, and will extend these relationships to the AJC networks of Fayette, Lauderdale, and Tipton Counties. An AWTN staff member attends AJC orientation every Monday and Tuesday, explaining to AJC customers the requirements for the ECMS program, and giving a point of contact at DHS to whom AJC customers may reach out in order to be fully screened for eligibility and to enroll.

AWTN shares its training calendar with AJC staff, including the Title I Provider DB Grant Associates, as well as the Tennessee Department of Labor and Workforce Development. Likewise, AWTN Career Coaches stay updated on AJC course offerings as well as education and training organizations that are One Stop System Partners, such as the Title II Provider HopeWorks as well as the approved vocational training programs on the State's Eligible Training Provider List (ETPL) posted at Jobs4TN.gov.

As described in C.2, AWTN has a Business Developer at Memphis Downtown AJC at least twice per week, and will work to extend coverage across the Greater Memphis Region to include Fayette, Lauderdale, and Tipton Counties. Having an on-site Business Developer at the AJC facilitates referrals of ECMS clients to the AJC One Stop System as it gives them a point person they would have already met at the AWTN office who can then refer the client to other AJC resources, including other job developers who may have specific accounts in the line of work the client is looking for, as well as available trainings in in-demand industries.

C.8 As talent and skill gaps continue to widen in an increasingly competitive economy, AWTN is developing innovative apprenticeships to create a new pipeline for the unemployed to gain access to companies who offer long-term careers. Corporations benefit from a strengthened hiring and retention structure, with AWTN facilitating a training regimen which prepares new hires not only for their new position, but also prepares them for promotion and longevity with the employer. Training curriculum for the customized job training through Starbucks, Amazon, and CVS is expected to be completed in 2019, and includes both online and classroom trainings covering specialized skills for positions at the company. AW works with the companies to provide training as part of participants' onboarding in their position and continues as professional development through their time on the job for a set period. These employers have given AWTN access to their training centers, curriculum and OJT programs nationally.

Nationwide Apprenticeship Partnerships with AW		
Company	Position(s)	
Amazon	Logistics Shift Assistant	
Starbucks	Shift Supervisor	
CVS	Pharmacy Tech, Shift Supervisor, Store Manager	

AWTN enjoys strong relationships with many of the local career technical programs in the Greater Memphis Region in order to bolster the career opportunities available to our clients. AWTN regularly hosts representatives from local institutions listed below, who speak to clients during orientation, and invites them to setup in common areas regularly to recruit students and answer questions. Representatives present details about the programs offered at their institution and address questions and concerns that clients may have. This has been very beneficial in ensuring that the clients can explore in-demand careers in the region that would most likely lead to full-time employment and self-sustainability for their families. The number of clients enrolled in technical programs has increased over the past

year, which in turn has allowed clients to receive technical degrees and certifications. Some of the most common certifications obtained include but are not limited to: Certified Medical Assistant; Certified Nursing Assistant; Phlebotomist;

Transportation, Distribution, and Logistics Training Organizations				
TN College of Applied Technology Olympic Career Training Institute	Drive Train	Swift Driving Academy		
Olympic Career Training Institute	Univ. of Memphis	Roadmaster Drivers School		

Information Technology **Training Organizations** Memphis Univ. Of SW TN Bethel Urban Lab Four Memphis League **Healthcare Training Organizations** Concorde Health SW TN C.C. College of Applied Science Career Career Tech Instit. The Healthca Allegiant Instit. of Memphis Univ. of Memphis cademy of College Instit. Healthcare National Solutions

Advanced Manufacturing/ Construction

Lewis Mechanical of Applied Science Lab Four Moore College

Cosmetology; Forklift/Heavy Machinery.

C.9 AWTN is committed to developing job opportunities for clients that expand across a wide variety of sectors and extend along a continuum of professional experience and education requirements, to ensure the right fit for every client. In order to connect clients with as many higher wage job opportunities as possible, Business Developers give particular focus to high demand industry clusters identified by the WIN: Information Technology, Healthcare, Advanced Manufacturing, Construction, Transportation, Distribution & Logistics. As described in C.8, AWTN has close relationships with the AJC One Stop Network and area training providers including local technical colleges who regularly come on-site to recruit clients. This not only helps clients get more information on available training programs while making it easier to enroll, it also helps AWTN solidify person-to-person relationships with training providers that aid in monitoring client progress in training programs. Many clients enroll in certification programs that match the skill needs of high demand industries, including but not limited to: Certified Medical Assistant; Certified Nursing Assistant; Phlebotomist; Forklift/Heavy Machinery. Upon course completion, the client's Career Coach refers the client to an AWTN Business Developer with a note on the course completed and certification obtained. The Business Developer identifies job opportunities related to their training field that offer competitive salary and benefits, coordinating with job developers from DB Grant Associates or other One Stop System partners as needed.

**C.10** AW has been providing employment and case management services since 1984. All populations we serve include individuals with different levels of functionality and barriers, some of which include limited employment experience, lack of employment experience, learning disabilities, criminal records, substance abuse, limited English proficiency, mental health disorders, domestic violence, low literacy, etc., that impede ability to gain and maintain employment. AW has been able to successfully engage clients of all levels of functionality based on our flexible approach to provide program services to clients based on individual needs.

During orientation, AWTN passes out brochures that clearly outline Support Services available through ECMS, such as dental, auto, and vision allowances. The brochures outline the process for obtaining these services, easing the burden on clients.

Once clients with barriers complete orientation, intensive intake is performed, primarily focusing on executing a review of the client's employment background, personal history, identification of any immediate needs, and character strengths. When assessing client personal history, AWTN inquiries about family background; personal/family needs; financial situation; mental illness and/or substance abuse history, etc. Career Coach/Specialists share inspiring success stories from past clients and use

motivational interviewing techniques to deviate from the institutionalized classroom feeling by personalization and individual engagement. The results are implemented in the client's IOP, which, alongside a career and education/training plan, includes specific supportive referrals to ameliorate client barriers.

AWTN places great emphasis upon the development of person-to-person relationships between client-facing staff and their

counterparts at supportive service organizations to facilitate referrals by providing a virtual "warm hand-off," allowing AWTN staff to track client participation in barrier removal activities. AWTN continually seeks new partners who fill gaps in services, provide better quality services, or operate at hours and location convenient to the client. The Family Resource Specialist devotes considerable time to community outreach efforts and the creation of mutual referral relationships with organizations that serve the target population such as transportation assistance providers, emergency assistance providers, child care resource and referral agencies, as well as legal services, and behavioral health. Some of AWTN's common referral partners are in the list on the right.

Organization	Services Offered
Assurance Wireless (Lifeline Assistance Program)	Free android smartphone, free monthly data, unlimited texts and montly minutes
Behavioral Health Initiatives	Mental health evaluations, counseling, etc.
Family Safety Centers	Assistance for victims of domestic violence
Southern College of Optometry America's Best Contacts and Eyeglasses	Eye exams, vision services
Hickory Hill Dental Practice Christ Community Health Services	Dental services
CHIPS Memphis	AIDS / STD screening
A Step Ahead Foundation	Birth Control, Women's Health

The Career Coach inputs any requests for distributions such as transportation assistance in to the emulator, along with any supportive service or incentive payment requests. AWTN Billing Manager, Casey Cass, reviews the request and makes the distribution, noting in Salesforce when it was given to the client. If the client needs auto repairs, the client must first get an invoice or estimate from a reputable provider. Printed estimates are required – never hand-written. The Billing Coordinator conducts due diligence to verify the car is registered and the client has a driver's license or family member able to drive the client, and that the repair is necessary for the movement of the car (as opposed to cosmetic repair or air conditioning). The Career Coach is responsible for retrieving the repair provider's receipt of payment from the client after the client receives funds for the repairs. All documentation to support the issuance of auto repair or other support service payments is kept in the client's case file and entered in to the emulator by the Billing Coordinator.

**C.11** The AW network has incorporated a comprehensive quality assurance plan based on corporate policies and state and federal requirements. Quality assurance monitoring primarily involves two items – case file review and contact checks.

Case File Review: Program Manager Demeshia Brock and Quality Assurance Specialist Benjamin Rosenberg each pull at least five (5) case files a week and review for completion and accuracy. This includes checking the items listed on the right. When reviewing, they complete a rubric regarding how the Career Coach is performing overall, which Ms. Brock uses during weekly check-ins with the each Career Coach to address any issues found.

**Contact Check**: Should Ms. Brock or Mr. Rosenberg notice a Career Coach is not contacting all of their clients, they perform a contact check as opposed to a case file review for the Career Coach. This occurs if they notice a lack of contact during file checks or in

#### Items Checked During Case File Review:

- There is a timesheet or paystub for every week the client has been with America Works
- · There is a change of activity form every time the client changed activities.
- There is a conciliation letter in the file every time the client was placed into conciliation
- There are proper missed hours timesheets for every time a client missed any of their hours
- The client was consistently assigned to 30 hours of activity in the State system of record (ACCENT)
  None of the activities the client were in expired (i.e. client was not assigned to job search for more
- None of the activities the client were in expired (i.e. client was not assigned to job search for more than 4 weeks at a time)
- ACCENT has been consistently updated with attendance, and the attendance records in ACCENT match the timesheets in the file
- All orientation paperwork is correct, and all orientation letters are in the file
- WEX/CS orientation letters are in the file for every time a client was scheduled for WEX/CS orientation
- There are proper case notes in ACCENT that explain the case with sufficient detail to make sure all
  issues with the client clear
- All school verification and employment verification meet the state's requirements
- · All supportive services, incentives, and transportation assistance are properly recorded in the case file

they notice a lack of contact during file checks or if the Career Coach's assigned activity numbers are low. Contact checks involve:

- Reviewing the attendance in ACCENT to see if it has been updated
- Checking case notes in ACCENT to see when the last time the CA contacted a client, and what the contact was about

Following contact checks, Ms. Brock creates a task in Salesforce to instruct the Career Coach to take certain action on a case. Salesforce allows AWTN to run a report for all the tasks assigned to a Career Coach, allowing management to easily follow up with a Career Coach regarding said tasks.

Staff Trainings: Ms. Brock and Mr. Rosenberg train Career Coaches on a weekly basis. Trainings include the following:

- One-on-one check-ins to review issues found in Case File Reviews or Contact Checks
- Quality Assurance training covering:
  - Case Notes in ACCENT
  - o Deemed Hours
  - o Conciliation Process

- o Attendance Records in ACCENT
- Counting Weeks and Months in ACCENT
- Employment Information updates in ACCENT

o Submitting & Requesting Supportive Services & Incentives

 Responding to alerts received from the State through ACCENT

Trainings are done through use of PowerPoint for visual aid, with interactive elements to ensure retention of information.

**Service Delivery Monitoring**: As previously discussed, all staff undergoes rigorous internal trainings to ensure they are knowledgeable in every aspect of program guidelines and requirements. Refresher Staff also undergo any State or DHS trainings offered. These trainings equip staff with the knowledge on how to implement and be compliant with service delivery components, including both weekly hour requirements and the maximum and minimum amount of time clients may be assigned to an activity.

AWTN is committed to ensuring all activities offer quality programming. The Site Director and Business Development Team complete onsite visits at work experience and CSP locations to evaluate the quality of training and ECMS client's satisfaction. For on-site vocational training, AWTN Management supervises training courses to ensure they remain aligned with industry standards. Classes are observed by the Lead Instructor and feedback is provided to the instructor to ensure continuous improvement. Instructors are also able to watch recordings of them teaching in order to 'self-evaluate.' For off-site vocational training, AWTN staff remain in close contact with the instructor and their supervisor to ensure that the individuals are obtaining the skills and knowledge to perform a specific occupation within the specific industry. AWTN staff remains in close contact with the instructor and their supervisor at education partner agencies to ensure that the individuals are obtaining the skills and knowledge for basic and remedial education or ESL. AWTN believes that, regardless of activity, constant communication between partner organizations and AWTN is vital to ensure that continuous program improvement occurs.

Customer Feedback: Customer satisfaction surveys are distributed among all AWTN clients to ensure the ability to play an active role in their program's development and provide the highest quality of opportunities among our clients. AWTN's customer satisfaction surveys are distributed randomly to clients and returned anonymously, enabling clients to feel comfortable in expressing themselves. Customer satisfaction surveys, suggestions, grievance findings and actions are always available for review by DHS.

**C.12** AWTN's approach to monitoring participation in assigned activities blends monitoring in to ongoing support – recognizing that the purpose of activities is not just attendance but that in attending clients are able to feel like they are progressing towards their career goals. This requires Career Coaches to "check-in" with clients not just when they need a time sheet or paystub but throughout their participation in ECMS. By maintaining rapport with clients through caring for their needs, Career Coaches are more easily able to get clients to comply with activity reporting requirements.

AWTN reviews weekly logs to ensure activity hours align with the IOP or career plan in the State system, and evaluate client progress, ensuring assigned components are in line with State mandated hours for Core and non-Core activities. AWTN follows state guidelines for holidays and excused absences. AWTN maintains timely entry of activities, with all activity hours entered in to the State system within five (5) business days for the previous week of activities or as changes occur with the client's work activity. AWTN provides all documentation to support data and client compliance information reported in the State system to the State for verification upon request. For activities that occur off-site, such as WEX, Community Service, or Vocational Training, for example, AWTN obtains attendance records from site supervisors or education/training institution to ensure clients are completing their required hours each week. The client timekeeping information is updated daily, with weekly signed timesheets provided from WEX sites to AWTN, and same day notification of WEX absences (both excused and unexcused) and lateness. Employment is verified monthly using paystubs, an EVF, or the Work Number. The Billing Coordinator communicates directly with the employer to verify employment for candidates following placement. The Career Coach/Specialist works with the Billing Coordinator to ensure the initial job start date, start title and hours per week has been appropriately completed and submitted. The job start date must be confirmed before the initial job reporting is entered.

Timekeeping data is entered into the emulator or maintained through paper-based time sheets. Timekeeping data management will be submitted monthly; however AWTN shall work closely with DHS to adapt to the new and changing needs of TANF accountability, and can provide this data bi-weekly, weekly, or even daily if so desired. Documentation of advance notice is entered in to the client's case file using a Change of Activity form every time a client changes assigned activities – including when a client becomes employed.